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U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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UNDER SEAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2016 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

OKSANA KOTYK,
aka "Oksana Djevorsky,"

Defendant.

SACR No 17

I N D I C T M E N T

[18 U.S.C. § 1546(a): Fraud and
Misuse of Visas, Permits, and
Other Documents; 18 U.S.C.
§ 1001(a)(2): False Statement to a
Department or Agency of the United
States]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1546(a)]

On or about October 23, 2015, in Orange County, within the
Central District of California, defendant OKSANA KOTYK, also known as
"Oksana Djevorsky" ("KOTYK"), knowingly made under oath, and as
permitted under penalty of perjury under Section 1746 of Title 28,
United States Code, knowingly subscribed as true, a false statement
with respect to a material fact in an application, affidavit, and
other document required by the immigration laws and regulations
prescribed thereunder. Specifically, in support of her Form I-485,
Application to Register Permanent Residence or Adjust Status,

1 defendant KOTYK knowingly falsely stated under oath to an officer of
2 the United States Department of Homeland Security, United States
3 Citizenship and Immigration Services, that her name was "Oksana
4 Djevorsky," that she was a citizen of Uzbekistan, that she had never
5 been issued a visa from the United States Consulate in Kiev, Ukraine,
6 and that she first entered the United States in June 2001, when in
7 fact, as defendant KOTYK then well knew, her name was not "Oksana
8 Djevorsky," she was not a citizen of Uzbekistan, she had previously
9 been issued a visa from the United States Consulate in Kiev, Ukraine,
10 and she first entered the United States prior to 2001.

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1 COUNT TWO

2 [18 U.S.C. § 1001(a)(2)]

3 On or about October 23, 2015, in Orange County, within the
4 Central District of California, in a matter within the jurisdiction
5 of the executive branch of the United States, namely, the United
6 States Department of Homeland Security, United States Citizenship and
7 Immigration Services ("USCIS"), defendant OKSANA KOTYK, also known as
8 "Oksana Djevorsky" ("KOTYK"), knowingly and willfully made materially
9 false, fictitious, and fraudulent statements and representations, in
10 that defendant KOTYK told a USCIS officer that her name was "Oksana
11 Djevorsky," that she was a citizen of Uzbekistan, that she had never
12 been issued a visa from the United States Consulate in Kiev, Ukraine,
13 and that she first entered the United States in June 2001. The
14 statements and representations were false because, as defendant KOTYK
15 then knew, her name was not "Oksana Djevorsky," she was not a citizen
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1 of Uzbekistan, she had previously been issued a visa from the United
2 States Consulate in Kiev, Ukraine, and she first entered the United
3 States prior to 2001.

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5 A TRUE BILL
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8 Foreperson

9 SANDRA R. BROWN
10 Acting United States Attorney



11 LAWRENCE S. MIDDLETON
12 Assistant United States Attorney
13 Chief, Criminal Division

14 DENNISE D. WILLETT
15 Assistant United States Attorney
16 Chief, Santa Ana Branch Office

17 SANDY LEAL
18 Assistant United States Attorney
19 Deputy Chief, Santa Ana Branch
20 Office

21 ROSALIND WANG
22 Assistant United States Attorney
23 Santa Ana Branch Office

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